

MAG Federal Fund Programming Principles
Competitive Project Selection Process for MAG Federal Funds

DRAFT August 6, 2008

DEFINITIONS

Clean Air Act – The Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes the Environmental Protection Agency to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emission of hazardous air pollutants. – (Summary of the Clean Air Act, <http://www.epa.gov/lawsregs/laws/caa.html>, Retrieved on May 9, 2008)

Congestion Mitigation and Air Quality (CMAQ) Improvement Program - Congestion Mitigation and Air Quality Program are federal funds that are available for projects that improve congestion and air quality in areas that do not meet clean air standards (“non-attainment” areas). The transportation projects and programs that are eligible under the Congestion Mitigation and Air Quality Improvement Program are: Transportation Control Measures (TCMs), Extreme Low-Temperature Cold Start Programs, Alternative Fuels, Congestion Relief & Traffic Flow Improvements (ITS projects and programs), Transit Improvements, Bicycle and Pedestrian Facilities and Programs, Travel Demand Management, Public Education and Outreach Activities, Transportation Management Associations, Carpooling and Vanpooling, Freight/Intermodal, Diesel Engine Retrofits, Idle Reduction, Training, I/M Programs, and Experimental Pilot Projects. The current federal guidelines related to the available CMAQ funding for the Competitive Project Selection Process for MAG Federal Funds is titled, ‘The Congestion Mitigation and Air Quality Program (CMAQ) under the SAFETEA–LU Interim Program Guidance’ can be accessed online at: <http://www.fhwa.dot.gov/environment/cmaq06gd.pdf>.

Contingency Projects - Projects identified during Interim Closeout if the number of projects submitted to use Closeout funds, exceeds the Interim Closeout amount. These projects would then be funded during Final Closeout under the condition that additional funds were identified by changes to a project schedule, to the apportionment or appropriations formulas, and/or notification of redistributed obligation authority (OA) that would increase the funds available.

Designated Representative – A designated representative of a jurisdiction is an employed staff person of the jurisdiction designated by the chief administrator to sign MAG funding request documents on behalf of that jurisdiction.

Eligible Projects/Project Components – Eligible projects/project components are defined by the current federal guidelines related to the type of federal fund that is being considered.

Incomplete Application – An application that does not have required application fields filled-in is defined as incomplete.

Joint Project – A joint project is a project that has more than one jurisdiction financially committed to the project.

MAG Approved Plan – MAG approved plans are used in the evaluation of Regional Projects. The list of MAG approved plans that can be used are the most recently approved Regional Transportation Plan, MAG ITS Strategic Plan – April 2001, MAG Strategic Transportation Safety Plan – October 2005, MAG Regional Bikeway Master Plan – 2007, Pedestrian Plan – 2000, MAG Regional Action Plan on Aging and Mobility, MAG Regional Off-Street System Plan – February 2001, and the Arizona Strategic Highway Safety Plan – August 2007

MAG Committee Process – For purposes related to this document and process: Transportation Review Committee, the Management Committee, the Transportation Policy Committee, and the Regional Council. Please see Appendix A

MAG Federal Fund Program – The MAG Federal Fund Program consists of projects in the MAG Transportation Improvement Program (TIP) that are funded with federal funds, both highway and transit projects. A component of this Program are the projects that are local sponsored, competitively selected and programmed through the MAG Process with Federal Funds. The categories that are available for local agencies to apply for federal funds through the MAG Process are: Arterial-ITS Projects – CMAQ funded, Arterial Projects – STP-MAG funded, Bicycle and Pedestrian Projects – CMAQ funded, and Air Quality Projects – CMAQ funded.

Regional Project – A transportation project that is sponsored and funded by one or more MAG member agency that impacts other jurisdictions besides those sponsoring the project. The project concept must be consistent with an approved MAG Plan.

SAFETEA-LU - On August 10, 2005, President George W. Bush signed the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). SAFETEA-LU authorizes the Federal surface transportation programs for highways, highway safety, and transit for the 5-year period 2005-2009.ⁱ

Surface Transportation Program (STP) funds – Surface Transportation Program funds are federal funds designated to be used on highways, transit or street projects.

The Transportation Programming Guidebook – The Guidebook is published on a yearly basis and its purpose is to provide MAG member agencies background information, instructions, and deadlines on the different transportation programs and requirements for the RTP, the MAG TIP, and the MAG Federal Fund Program for the upcoming fiscal year.

Technical Advisory Committees (TAC) – The MAG Technical Advisory Committees that are related to Competitive Project Selection Process for MAG Federal Funds are the MAG Street Committee, MAG Intelligent Transportation System (ITS) Committee, Air Quality Technical Advisory Committee, and the Pedestrian Working Group and the Regional Bicycle Task Force. Please see Appendix A

ⁱ SAFETEA-LU Home Page. *US Department of Transportation, Federal Highway Administration*. Retrieved on July 9, 2008 from <http://www.fhwa.dot.gov/safetealu/index.htm>.

100. Guiding Principles

1. The MAG Federal Fund Programming Principles for the Region shall comply with federal laws. The Principles will be reviewed and updated for compliance as new state, and federal laws are adopted.
2. The MAG Federal Fund Programming Principles will incorporate policy direction, as appropriate from Regional Council approved MAG Transportation Plans.
3. The MAG Federal Fund Programming Principles and changes to the Principles will be approved through the MAG Committee Process including the Transportation Review Committee, the Management Committee, the Transportation Policy Committee, and the Regional Council. Please see Appendix A for the MAG Committee Structure chart.
4. The MAG Federal Fund Programming Principles are applicable to federal funded projects that are competitively selected and programmed through the MAG process. These projects compose part of the MAG Federal Fund Program.
5. Member agencies are encouraged to complete programmed federal funded projects on schedule to ensure that committed obligation authority is fully used, and to increase prospects of receiving a share of Arizona redistributed obligation authority.
6. A commitment will be made to use Congestion Mitigation and Air Quality (CMAQ) funds at the same rate of Surface Transportation Program (STP) funds. STP funds will not be obligated at a higher rate than CMAQ funds, which means the obligation authority percentage for CMAQ funds will be equal to or higher than the rate for STP funds.
7. *The Transportation Programming Guidebook (Guidebook)* will be published annually, prior to the start of the application process. The *Guidebook* will describe and provide the programming schedule and deadlines for the MAG Federal Fund Program, application forms, Federal fund estimates, programming process information per modal type, and contacts.
8. In accordance with the Clean Air Act, projects which are committed measures in the MAG air quality plans are legally binding for implementation. Examples include: Paving Unpaved Road Projects, PM-10 Certified Street Sweepers, and Paving Unpaved Road Shoulders. In addition, these types of projects are also essential for demonstrating air quality conformity for the Transportation Improvement Program and Regional Transportation Plan.

200. Application Process

1. Annually, MAG will request MAG member agencies to submit new project applications for consideration in the MAG Federal Fund Program dependent on the needs established by the *Guidebook*.
 - a. Project applications submitted from prior years will not be retained or used.

2. A pre-application workshop/meeting will be available to MAG member agencies to review available funding amounts, applications, schedules, and due dates for the competitive project selection process for MAG Federal funds.
3. (Moved, combined, and reworded) A project can be sponsored and funded by one agency; be a joint project with multiple funding partners; or be considered a regional project.
 - a. A Joint Project has more than one agency financially contributing to the project.

The application must: -

 - i. Be submitted by the sponsoring agency that will be responsible for implementing the project and reporting on it to MAG;
 - ii. List the main contacts for all agencies involved;
 - iii. Document how the local cost component will be shared between the partnering agencies; and
 - iv. Include signatures from each jurisdiction's Manager(s)/Administrator(s) or designated representative.
 - b. A Regional Project is a transportation project that is sponsored and funded by one or more MAG member agency that impacts other jurisdictions besides those sponsoring the project and the project concept is consistent with an approved MAG Plan.
4. The application forms will annotate and define the required information.
 - a. Each application will have a checklist of application components to be completed by the sponsoring agency. The information that is required for will be identified on the checklist.
 - b. Each application will be signed by the Manager/Administrator of the jurisdiction or designated representative.
5. Completed applications must be submitted before or on the due date and time. Late applications will not be accepted.
 - a. Completed applications will be printed, signed by the jurisdiction Manager/Administrator or designated representative, and submitted via fax, e-mail (scan of signed application), mail, or in person.
 - b. If a completed application is faxed or e-mailed with the required signature, it is accepted at that time, but it is required that the original signed hard copy will follow either in the mail or be delivered in person.
 - c. Upon receiving the application, MAG staff will review submitted application for required information. MAG staff will complete an application receipt indicating the date and time it was received, and if the application was complete or incomplete.
 - i. If the application is incomplete, the application receipt will note the incomplete fields.
 - ii. The sponsoring agency will have two working days to complete the incomplete fields. The due date and time to submit incomplete field information will be noted on the application receipt.
 - d. The application will also be submitted electronically for ease of data entry.
6. MAG staff will review the application to verify the eligibility of the project, and project components in the context of the current Federal regulations following the due date of project applications.

- a. MAG staff will work with Federal Highway Administration (FHWA) to determine eligibility.
 - b. The current federal guidelines related to the CMAQ funding, which is available for the Competitive Project Selection Process for MAG Federal Funds is titled, 'The Congestion Mitigation and Air Quality Improvement Program (CMAQ) under the SAFETEA-LU Interim Program Guidance' can be accessed online at: <http://www.fhwa.dot.gov/environment/cmaq06gd.pdf>. Copies are also available at MAG.
 - c. If a project is not eligible under the current Federal regulations, a notification will be sent to the project contact within two weeks.
 - d. If certain project components are not eligible under the current Federal regulations, MAG staff will work with the jurisdiction to modify the project budget components for eligibility purposes. MAG staff and the sponsoring agency representatives will present and explain the original and modified application at the technical advisory committee.
7. Project information from the applications will be compiled by MAG Staff.

300. Competitive Project Selection Process for MAG Federal Funds

1. MAG has an established project application, programming schedule, project evaluation process, and project selection process that are explained and published in *The Transportation Programming Guidebook*.
2. Complete and eligible project applications submitted for consideration in the MAG Federal Fund Program are processed through the MAG Committee Process for project evaluation, and selection. This process includes an evaluation of the expected emissions reductions and cost effectiveness, a project evaluation process at the Technical Advisory Committees (TAC), and project selection through the MAG Committee Process: Transportation Review Committee (TRC), Management Committee, and Transportation Policy Committee (TPC) for review and recommendation, and then Regional Council for approval.
3. (Section moved, combined, and reworded) In accordance with federal CMAQ guidance, an evaluation of the expected emissions reductions and cost effectiveness is conducted for all proposed CMAQ funded projects by MAG staff for consideration by the Air Quality Technical Advisory Committee (AQTAC). The role of the AQTAC is to forward the evaluation of proposed CMAQ funded projects to the Transportation Review Committee (TRC) and the Technical Advisory Committees for use in prioritizing projects.
4. A congestion management analysis will be conducted, as appropriate, during the project evaluation process.
5. The transportation project types and responsible technical advisory committees (TAC) are:
 - a. Bicycle & Pedestrian Projects will be presented, reviewed, ranked at the Pedestrian Working Group and The Regional Bicycle Task Force, and then forwarded to the TRC.
 - b. Intelligent Transportation System (ITS) Projects will be presented, reviewed, and ranked at the ITS Committee, and then forwarded to the TRC.

- c. Paving Unpaved Road Projects will be presented and reviewed at the Street Committee, ranked at the Air Quality TAC, and then forwarded to the TRC.
 - d. PM-10 Certified Street Sweeper Projects will be reviewed at the Street Committee, ranked at the Air Quality TAC, and then forwarded to the MAG Management Committee.
 - e. In addition, the AQTAC may forward a ranking of Air Quality Projects to the Transportation Review Committee.
6. The Technical Advisory Committee's role is to develop and administer a project evaluation process that involves a technical evaluation, project criteria analysis, and a qualitative assessment that is guided by the goals and objectives of the MAG Regional Transportation Plan (RTP), and Federal guidelines.
- a. The TAC is responsible to implement its project evaluation process and produce a ranked order list of project applications to be considered for Federal funding. The rank ordered list is then forwarded to the TRC.
 - b. Technical Advisory Committees will not change the project scope, schedule, budget, or requested federal funds during the evaluation process. The TAC's purpose is to rank order projects as submitted in the application through a project evaluation process.
7. Project information from the complete applications will be sent to the technical advisory committee (TAC) for a tiered review process. Please see Appendix B for flow chart.
- a. At the first TAC meeting, the sponsoring agency will present their project(s) and have the TAC review the application information.
 - b. If the committee would like further clarification on project information contained in the application, the project sponsor can answer clarification questions at the first meeting, and the project sponsor also has the opportunity to clarify information on the application for the second TAC meeting. The Committee will not change scope, schedule, nor budget for requested funds.
 - The MAG Staff person for that TAC will provide the date for revised application information to be submitted to MAG in preparation for the second TAC meeting.
 - c. The expected emissions reductions and cost effectiveness for all proposed CMAQ funded projects are evaluated by MAG staff for consideration by the AQTAC. A congestion management analysis will be conducted, as appropriate, during the project evaluation process.
 - d. At the second TAC meeting, any clarified project information is presented, and the project ranking can move forward based on the TAC approved process including the technical evaluation, project criteria analysis, and the qualitative assessment.
 - e. The ranked list of projects and evaluation summary is then forwarded from the TAC to the Transportation Review Committee for project selection, and then continues through the MAG Committee Process.
 - f. The PM-10 Certified Street Sweeper ranked list of projects and evaluation summary is forwarded directly from the AQTAC to the Management Committee for project selection, and then to the MAG Regional Council.
8. The Transportation Review Committee's (TRC) role is to review the evaluation and analysis completed by the TACs, and recommend projects to be selected and programmed with Federal funds based on guidelines established for project selection.

- a. The TRC can make recommendations to change the project scope, schedule, or budget during the project selection process.
 - b. If the amount of federal funds for a project is recommended to be lower than initially requested in the project application, or the scope of the project is recommended to change, the project application with proposed changes will be sent back to the Manager/Administrator of the jurisdiction or designated representative for acceptance of new funding amounts or scope change.
 - At the same time, MAG staff will determine if the CMAQ evaluation is affected.
 - The programming process is delayed accordingly.
 - c. The TRC will develop guidelines for project selection.
 - d. The recommended projects selected for available federal funds and a summary of selection process will then be forwarded to the MAG Management Committee, TPC, and Regional Council for approval.
9. Projects selected and approved by MAG Regional Council to be programmed with federal funds will be included in the MAG Transportation Improvement Program (TIP).
 - a. As required by Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), the TIP shall include projects only if full funding can be reasonably anticipated to be available within the time period contemplated for completion of the project. In nonattainment and maintenance areas, projects included in the first two years of the TIP shall be limited to those for which funds are available or committed.ⁱⁱ
 - b. This requirement is for all funding sources including the local match funds for projects programmed with federal funds.
10. For construction projects that are selected to be programmed with federal funds into the MAG Transportation Improvement Program (TIP), a design/clearance phase will be programmed *at least* one year prior to the federally funded construction phase depending on the information and schedule provided in the project application.
 - a. It is not assumed that the separate design/clearance phase is funded with federal funds. Member agencies can request federal funds for the design phase *if* federal funds are available either in the programming process or the closeout.
 - b. Member agencies will program the design & clearance phase with scope, budget, and schedule information provided in the initial application.

400. Programmed Federal Fund Projects

1. If a federal fund project does not use the full amount of its programmed and obligated federal funds, the remaining balance of unused federal funds, will be returned to the region to be reprogrammed.
 - a. The member agency shall notify MAG of the amount of unused federal funds once construction and invoicing is completed with ADOT.
2. If a member agency is not able to complete a federal funded project with federal funds, the federal funds will be returned to the region to be reprogrammed.

ⁱⁱ Department of Transportation - Statewide Transportation Planning; Metropolitan Transportation Planning; Final Rule, Federal Register, Wednesday, February 14, 2007, Part III §450.324(i). *US Department of Transportation, Federal Highway Administration*. Retrieved on August 1, 2008 from <http://www.fhwa.dot.gov/HEP/legreg.htm>.

- a. The member agency shall notify MAG if it decides it will not utilize federal funds for a project.
3. The amount of MAG federal funds available for a project is the programmed amount listed in an approved TIP. Member agencies are responsible for any project cost increases.
4. A member agency can request a change to a programmed Federal Fund Project in the TIP for the current fiscal year.
 - a. Types of project changes: advancing the project, segmenting the project, or modification of the Project Scope. All Project Change requests are reviewed on a case-by-case basis.
 - i. If a MAG member agency requests to advance a federal fund project, or project phase with local funds, an Intergovernmental Agreement (IGA) with ADOT is required. Advancing a project or phase of a project includes (1) design advancement, (2) ROW advancement and/or (3) construction advancement. The jurisdiction will be responsible to utilize "local" funds to advance the requested project or phases. The sponsoring agency is required to develop the project or phase to federal standards.
 - b. MAG staff will review the eligibility of the project change request by the Federal guidelines.
 - c. MAG staff will review the impact of the project change request on the conforming TIP and Plan. For example, the advancement or deferral of a project could affect analysis year modeling assumptions, and require a redetermination of conformity.
 - d. MAG staff will also review, analyze, and summarize how the project change request will impact the CMAQ evaluation and other criteria the TAC has established.
 - e. The requested change will go through the MAG Committee Process, as part of the Project Change request, beginning at the appropriate technical advisory committee that originally programmed/prioritized them.
 - f. This does not include notifications of deferred projects and/or projects that will not be utilizing federal funds. Notifications of deferred projects and/or projects that will not be using federal funds will occur during the Closeout.
5. Once a project change request has been approved through the MAG Committee Process, the TIP is amended/modified, and the changes are sent forward to ADOT and FHWA to amend/modify the STIP.
6. MAG Staff produces a status report on projects programmed with federal funds semiannually. The status report indicates the progress of the project through the milestones of the required Federal process.

500. Closeout Process

1. MAG attempts to utilize all of the spending authority, known as Obligation Authority (OA), made available to the region. To meet this goal, MAG established a Closeout process. The most important criteria for a project to be funded through closeout is that it has completed, is near completion of the federal project development process administered by ADOT Local Government Section, and/or be in a position to obligate by the end of the current federal fiscal year.
2. The Closeout Process consists of three phases:

- a. Initial Closeout: The initial closeout usually occurs as soon as the FY Appropriations Bill is available. It involves a simple comparison between the funds available and the projects programmed, resulting in an estimate of “uncommitted” funds.
 - b. Interim Closeout: Member agencies notify MAG staff, during the month of March of each year, of the projects that they wish to defer from the current fiscal year to the following fiscal year or that they do not wish to proceed with. When this total amount of federal funds to be deferred or removed is known, agencies are then requested to identify projects that can utilize the funds made available. Project submittals to use Closeout funds usually occur in mid to late April. Through the MAG Committee Process, Closeout projects are selected in the established priority order as described in 700.2. If the number of projects submitted to use Closeout funds, exceeds the Interim Closeout amount, a contingency project list of rank ordered projects may be developed.
 - c. Final Closeout: Final Closeout captures additional funds identified by changes to a project schedule, to the apportionment or appropriations formulas, and notification of redistributed obligation authority (OA) that can add to, or subtract from, the funds available. If additional funds are identified, contingency projects that were identified and rank ordered during Interim Closeout can be funded.
- 3. *The Transportation Programming Guidebook* will explain the Closeout schedule, due dates, forms, and requirements for project deferrals and project submittals for the Closeout.
- 4. During the closeout process, the deferred projects and non-obligated federal funds will be considered within each mode as determined by the Regional Transportation Plan (RTP).
- 5. If a MAG federally funded project is requested to be deferred, the close-out process continues through the mode classification of the project.
- 6. The modes that are programmed in the RTP to receive federal funds and are in the MAG Federal Fund Program are: Streets/ITS-CMAQ, Streets-STP-MAG, Bicycle/Ped-CMAQ, and Air Quality-CMAQ. The funds (in dollars not percentages) would stay in each mode.
 - i. Example: if Bike Project A, funded by CMAQ, was deferred to a later year, the funds associated with Bike Project A would stay in the Bike/Pedestrian mode.

600. Closeout Process – Deferrals

- 1. MAG member agencies will complete a Project Deferral/Deletion Form to request a project to be deferred, to delete federal funds from a project, or to delete a federal funded project from the current TIP.
 - a. The *Guidebook* will explain the schedule and forms.
- 2. For construction and right of way projects, member agencies would be allowed a one time deferral without justification.
 - a. If this project has a design contract underway, the project would be deferred 1 year, if and only if, it had an approved scoping document, project assessment, or DCR from ADOT.
 - b. If there is no design contract underway, the project would be deferred 2 years as it generally takes 2 years to complete the ADOT process.

- c. If there is a design and clearance work phase for the project, it would be deferred accordingly.
3. For procurement, pre design, design, and planning study projects, member agencies would be allowed a one time deferral without justification.
4. If a project is requesting to be deferred for the second time or more, the sponsoring agency for the project will submit a justification letter explaining why the project should remain in the MAG Federal Fund Program.
 - a. The sponsoring agency for the project will submit a justification letter to MAG with the deferral notification that will be taken through the MAG Committee Process, beginning at TRC.
 - i. If the justification is approved the project would remain in the program.
 - ii. If the justification is not submitted or not approved, the project would be removed from the program.
 - b. MAG will provide either a form, or memo explaining the information for the justification memo in *The Transportation Programming Guidebook*.

700. Closeout Process - Prioritization of Unobligated Federal Funds

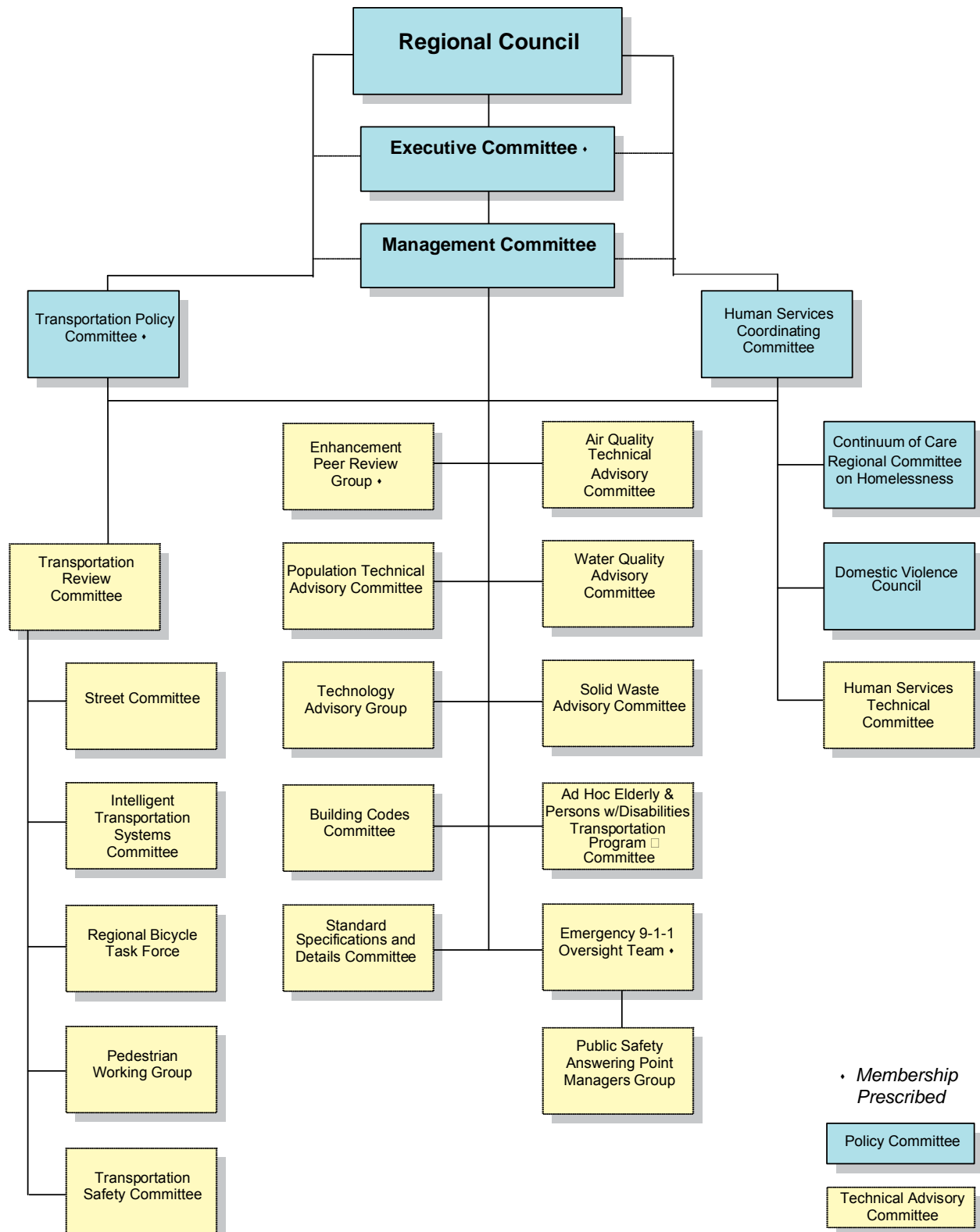
1. MAG member agencies will complete a Closeout Project Submittal or a new project application to submit projects for the use of unobligated Federal funds for the current federal fiscal year.
 - a. The *Guidebook* will explain due dates and forms.
 - b. Forms and/or applications must be submitted before or on the due date and time. Late forms and/or applications will not be accepted.
2. Projects submitted for use of Closeout funds will be selected based on the following three priorities in order:
 - a. Advancing projects (or phases of projects) of the same mode, that are already programmed in the current Transportation Improvement Program (TIP) with MAG federal funds from a future year, in chronological order of the TIP;
 - b. Adding additional federal funds to an existing, unobligated project, up to the originally programmed, federal-aid maximum, or the maximum established by the mode in the RTP, whichever is less.
 - c. New projects
3. Local jurisdictions submitting a project for advancement or additional funds will complete and submit a Closeout Project Submittal Form by the due date for project submittals for Closeout funds.
4. Local jurisdictions submitting a new project for Closeout will complete and submit the most current project application form by the due date for project submittals for Closeout funds.
5. MAG staff will conduct a fiscal analysis to determine if the program can provide additional funds to an existing project (priority 2), and/or fund new projects (priority 3) within the fiscally constrained federal programs in the current TIP.

6. MAG staff will review the projects submitted for Closeout funds with ADOT Local Government Section to ensure that the projects can be obligated before the end of the current federal fiscal year.
7. Once projects are submitted, an evaluation of the expected emissions reductions and cost effectiveness is conducted for all proposed CMAQ funded projects by MAG staff for consideration by the Air Quality Technical Advisory Committee (AQTAC). The proposed projects proceed through the MAG Committee Process for evaluation and prioritization beginning at TRC.

800. Re-distributed Obligation Authority (OA)

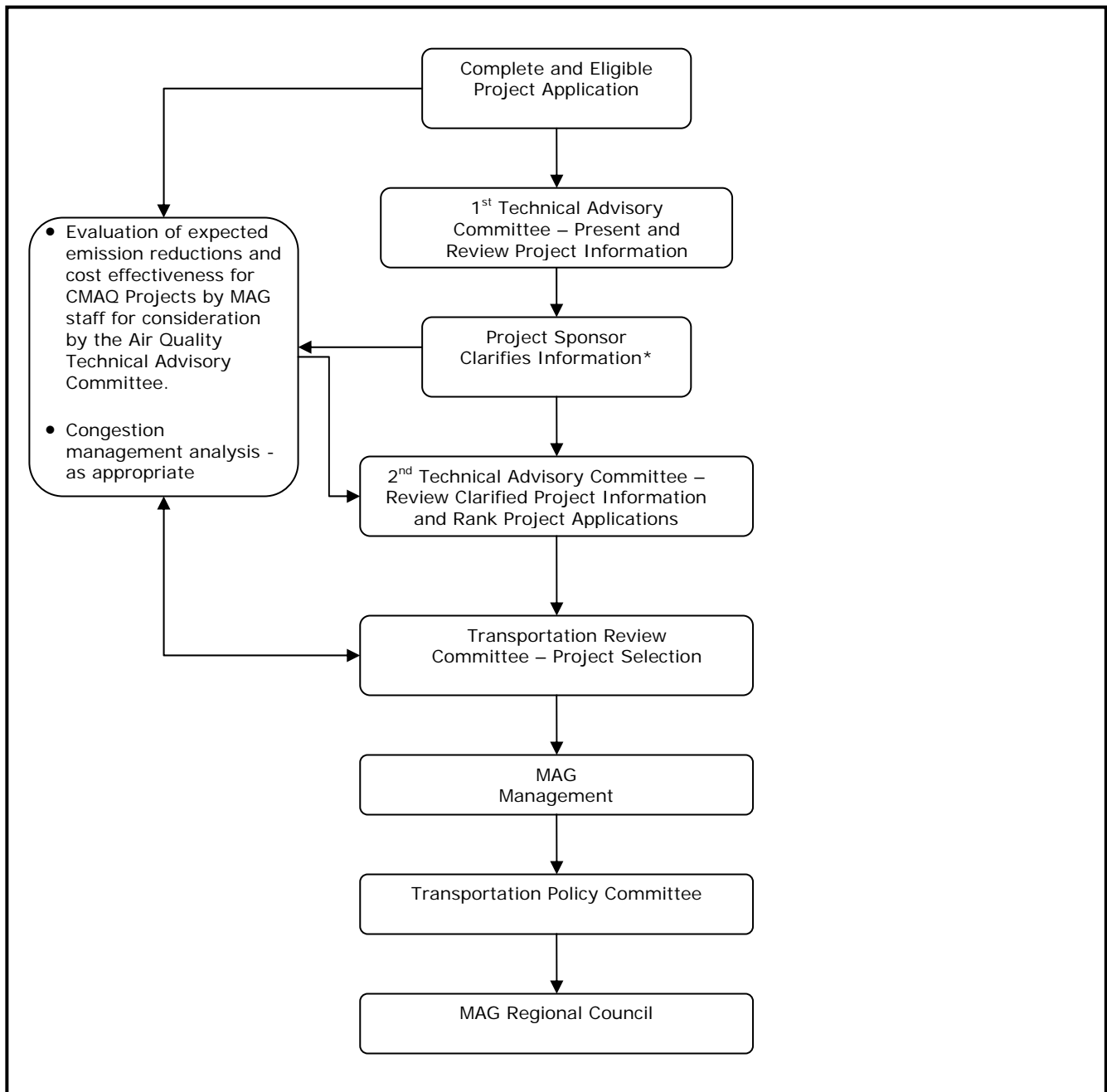
1. Re-distributed OA are federal funds in addition to the annual allocation and obligation authority that are distributed to the states. These additional funds are usually distributed at the end of the federal fiscal year. It will be decided through the MAG Committee Process on the Region's priority/priorities for re-distributed OA. The priorities can, but are not limited to, establishing contingency lists of projects for funding. This allows the MAG Committees flexibility to address the needs of the region, which can change over time.
 - a. The priority/priorities for re-distributed OA will be established during the close-out process, which can be funded in the remainder of the current fiscal year.

APPENDIX A



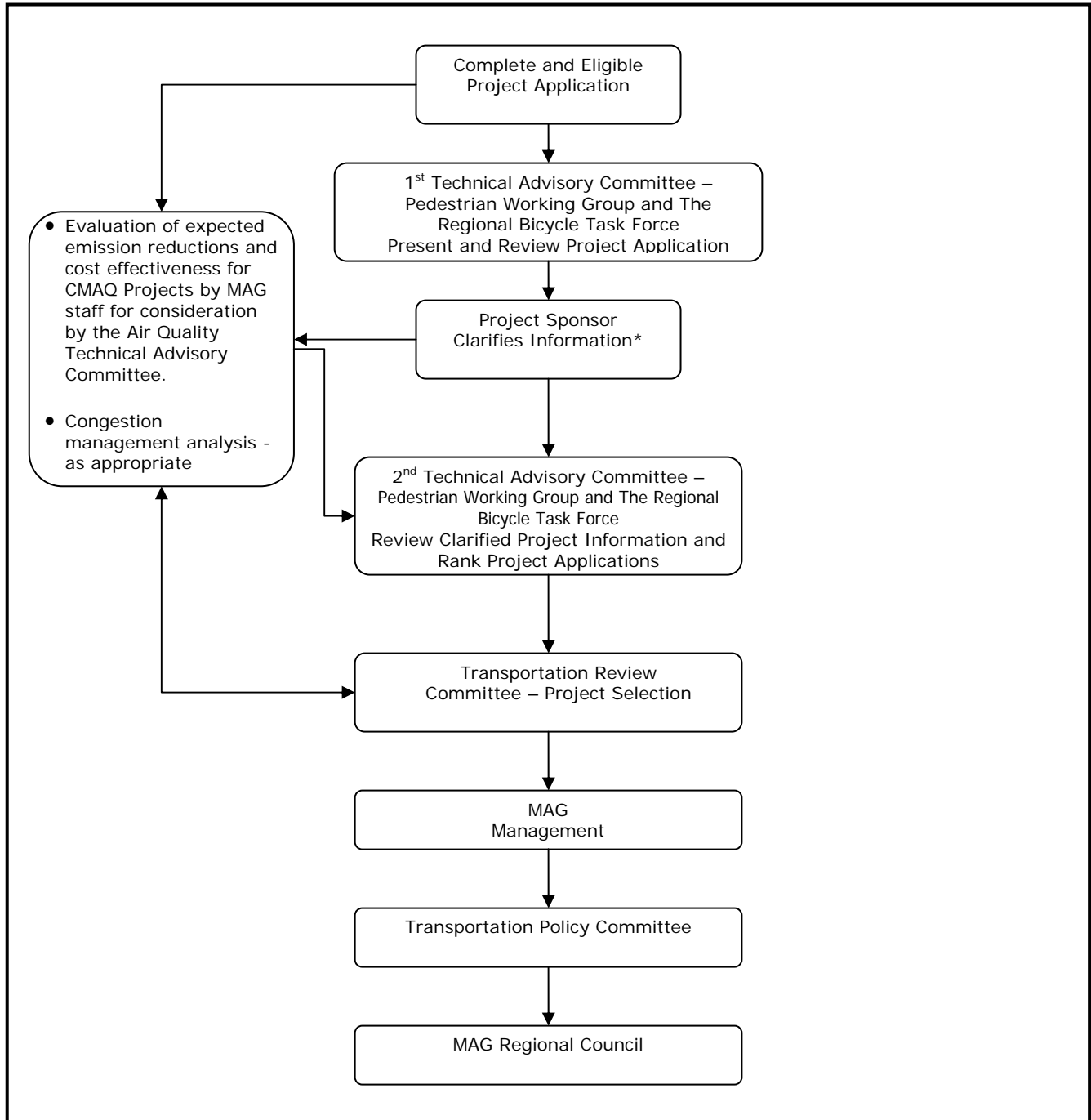
APPENDIX B

Flowchart – Competitive Project Selection Process for MAG Federal Funds



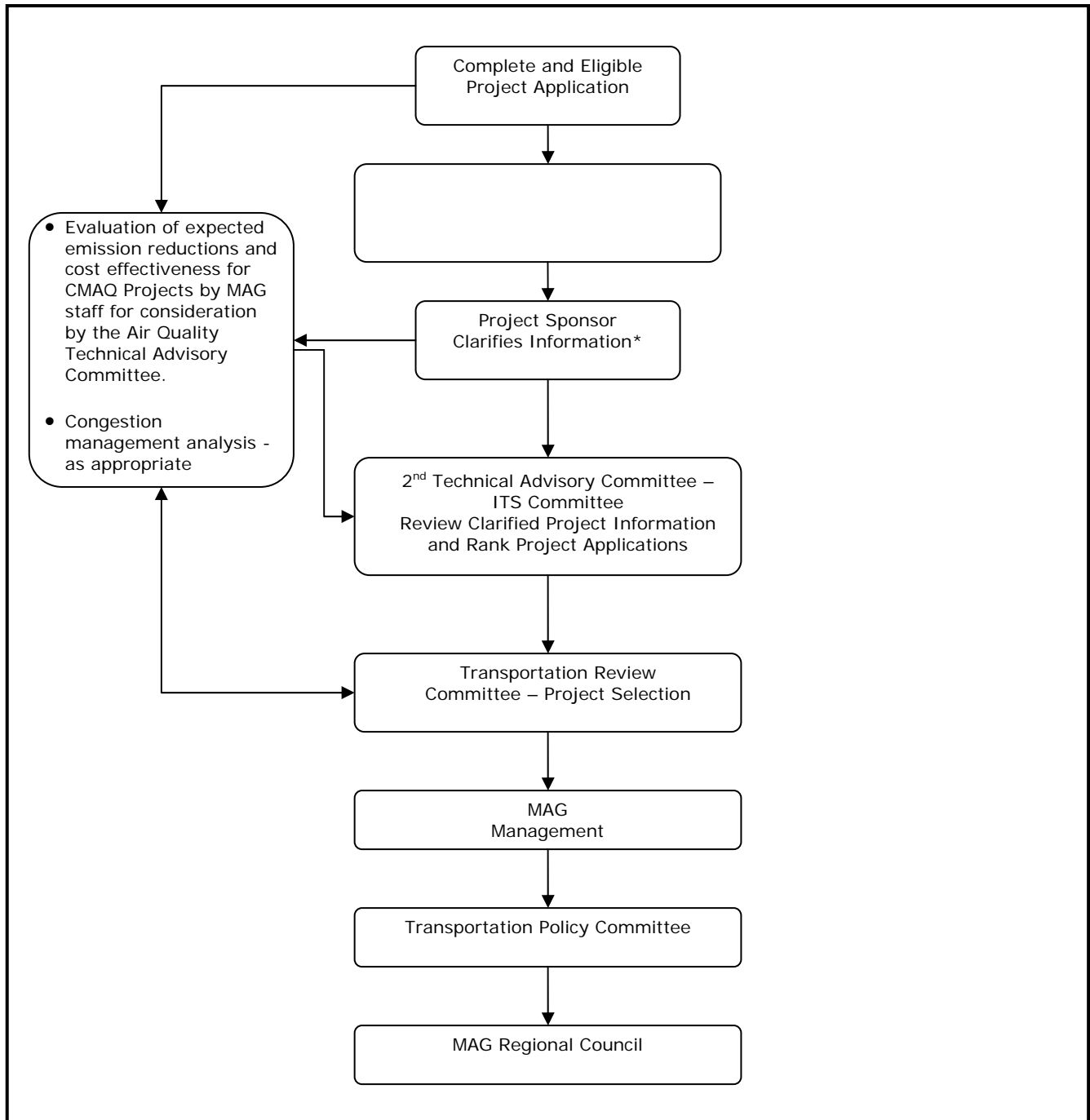
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Flowchart – Competitive Project Selection Process for MAG BICYCLE AND PEDESTRIAN PROJECTS



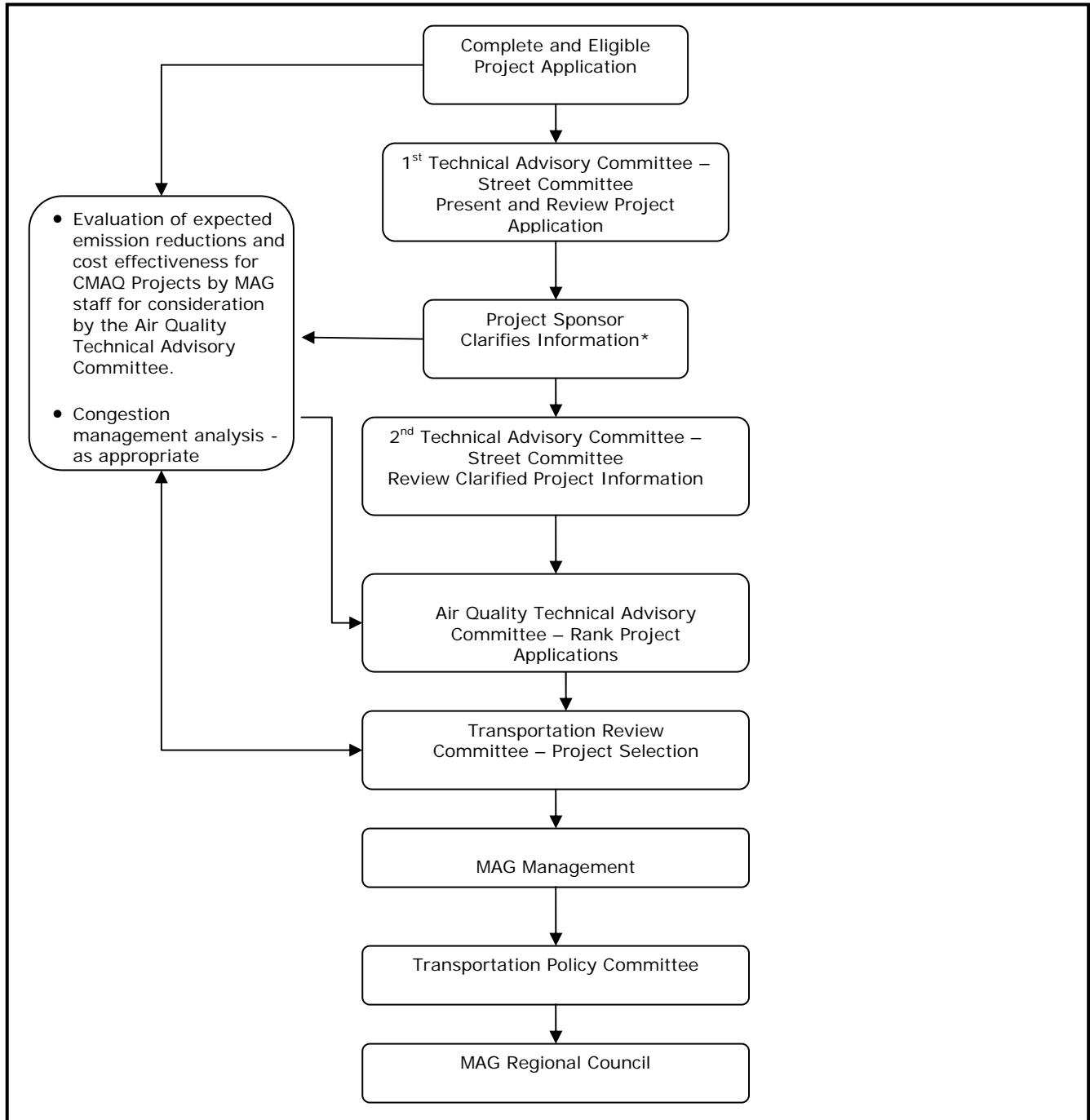
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Flowchart – Competitive Project Selection Process for MAG INTELLIGENT TRANSPORTATION SYSTEM (ITS) PROJECTS



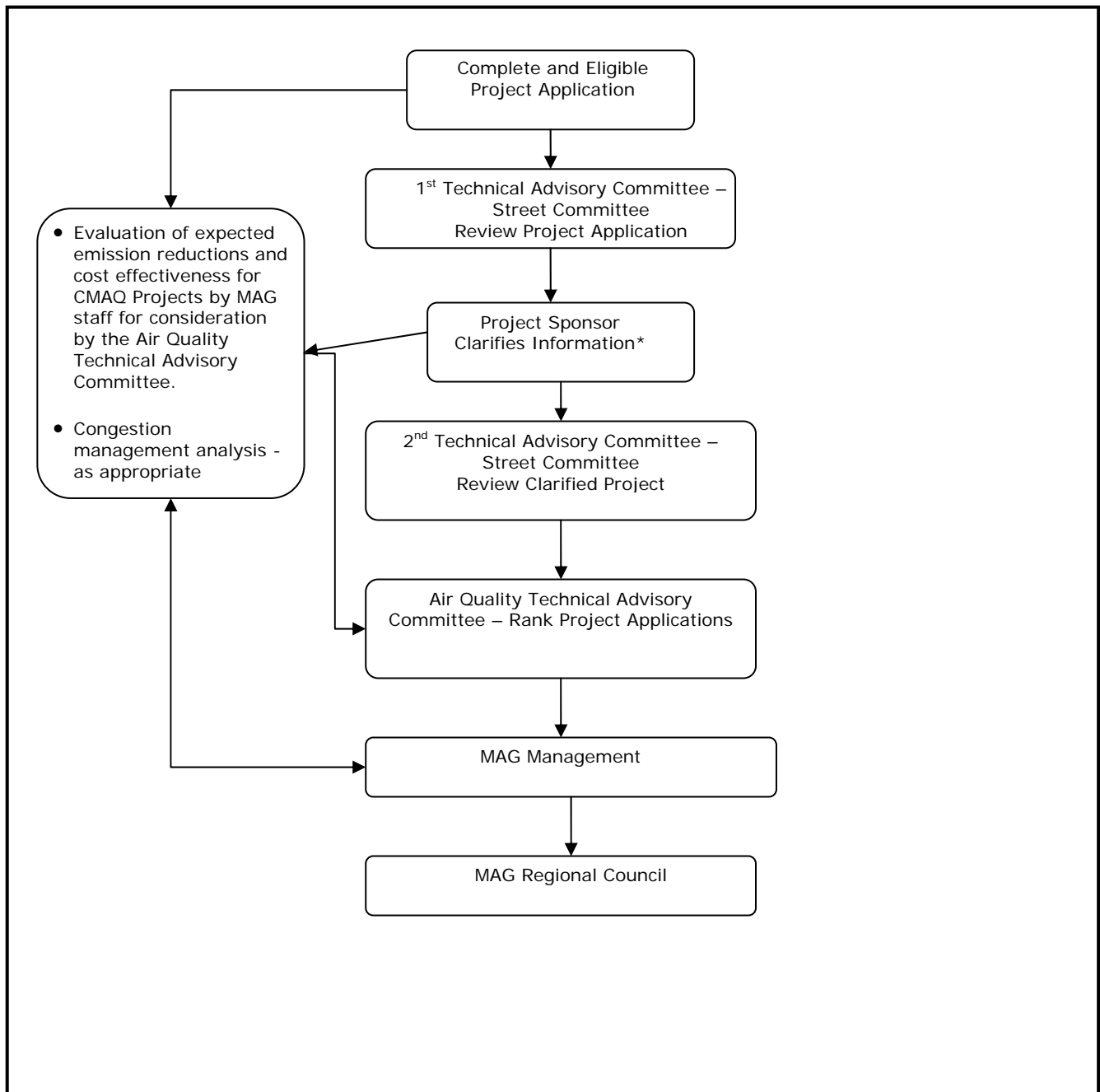
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Flowchart – Competitive Project Selection Process for MAG Federal Funds PAVE UNPAVED ROAD PROJECTS



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Flowchart – Competitive Project Selection Process for MAG Federal
Funds
PM-10 CERTIFIED STREET SWEEPERS



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